

February 28, 2014

Regional Freedom of Information Officer
U. S. EPA, Region 5
77 W. Jackson Blvd. (MI-9J)
Chicago, IL 60604-3590

**Re: Request for Information Pursuant to the Freedom of Information Act
Documents Related to Mitigation Projects For Approved Consent Decrees
for Coal-Fired Power Plants**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, I hereby request a copy of all non-privileged documents (including correspondence, e-mails, letters, telephone logs, meeting notes, reports, memoranda, photographs and related hard copy and electronic documents) related to mitigation projects required by Consent Decrees under the NSR/PSD Enforcement Initiative for coal-fired power plants ("Consent Decrees"). This request includes, but is not limited to, documents for the mitigation projects aspect of Consent Decrees entered into by Wisconsin Public Service Corporation, Dairyland Power Cooperative, Northern Indiana Public Service Co., Cinergy Corporation, Illinois Power Company (and Dynegy Midwest Generation, Inc.), Dominion Energy, Inc., Ohio Edison Company, American Electric Power Service Corp., American Municipal Power, Inc., Hoosier Energy Rural Electric Cooperative and Wisconsin Electric Power Company. I request:

1. Copies of all portions of the Consent Decrees directly related to mitigation projects. These are usually designated as "Exhibit A" to the Consent Decrees.
2. Copies of all documents related to the submission of proposed project plans for mitigation projects.
3. Correspondence between U.S. EPA and/or the Department of Justice, and any of the companies listed above, related to mitigation projects required by the Consent Decrees. This request specifically includes e-mail and hard copy correspondence.
4. Copies of all approved mitigation plans required by the Consent Decrees.

If this request is denied in whole or part, please justify the denial of any portion of this request, as well as any and all deletions, by reference to specific exemptions of the Act.

Thank you in advance for your cooperation. We understand that there will be charges for the copies of documents responsive to this FOIA request. We are willing to pay reasonable duplication fees for the processing of this request. If you have any questions concerning this request, please feel free to contact me at (317) 713-3523 or rclark@taftlaw.com.

Respectfully,

A handwritten signature in black ink, appearing to read "Robert R. Clark", with a stylized flourish extending to the right.

RRC/mma

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